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I am writing in response for a request for information on "Public Access to Peer-Reviewed Scholarly Publications Resulting From Federally Funded Research" [Federal Register Volume 76, Number 214]

I am a senior scientist in the USDA (Microbiologist, ST) and have over 30 years of experience as a reviewer, editor and senior editor for scientific journals. I am on the editorial boards for *Applied and Environmental Microbiology, Applied Microbiology and Biotechnology, FEMS Yeast Research, Metabolic Engineering, Enzyme and Microbial Technology* and *Protein Expression and Purification,* and I am a Senior Editor for the *Journal of Industrial Microbiology and Biotechnology.* I am a periodic or ad-hoc reviewer for *Science, PNAS, Nature Biotechnology* and a number of other journals. As such I have considerable interest in the editorial, review and publication process.

Your request for information concerning "...approaches [to ensure] <u>long-term stewardship</u> and <u>broad public access</u> to the peer-reviewed scholarly publications that result from federally funded scientific research..." seems appropriate in the light of the current rapid expansion of on-line journals.

While broad public access certainly has increased as a result of the "Public or Open access; online journal" model, I am less confident about the issue of long-term stewardship, and I am very concerned about the quality of papers published in such journals. To be clear, online journals provide a rapid, inexpensive way for publishers to distribute scientific articles to their readership. Increased revenue from the Open Access publication fee benefits the publisher, and the author benefits from a higher citation frequency – regardless of the quality of the paper.

The problem with this model is that the costs associated with publication represent a very small fraction of the cost of generating and distributing scientific data. The major costs are the experiments themselves, along with writing, editing and reviewing. The Publisher basically gets the Authors' time for writing the papers, the Editors' time for handling the manuscript and the Reviewers' time for reading the papers at little or no cost. While this assures that the scientific data are widely distributed, it gives a strong monetary benefit to Publishers to create more online journals in order to collect more processing fees. It also creates a very strong demand for qualified reviewers. Unfortunately, with so many new on-line journals the demand for qualified editors and reviewers greatly exceeds the supply. Consequently, more papers of lower quality are accepted for publication and widely distributed despite their questionable quality.

In fact, the Editor in Chief of a respected peer-reviewed publication told me "Originality is not a criterion for publication for on-line journals." He was not expressing this as an opinion in derision so much as in support of starting a new on-line journal in order to raise additional funds. The publisher for his current journal was encouraging him to start an on-line journal as a way to create new revenue. He saw this chiefly as a money making proposition.

The Open Access aspect virtually guarantees a bump of two or three points in the citation frequency of a manuscript – regardless of the quality of the contents. Thus, it is no longer possible to judge the quality of a journal simply by citation or download frequency.

It is not at all clear to me that the many new publications that are coming on-line have the capacity to maintain records and public access over the decades in which public access is necessary. Nor is it at all clear that these new journals are serving a useful function.

In the past three years, we have seen a flood of new manuscripts from China and India. While a few are well written and deal with novel topics, most are simply a rehash of things that were published many years before.

Open Access and electronic publishing certainly have given opportunities to specialized scientific areas, and I am certain that there are useful models that could assure the distribution of high quality literature while maintaining low publication costs, but the economic pressures to increase publication frequency is currently straining the editorial and review processes.